

EXHIBIT B

From: Paul Collins
Sent: Saturday, April 23, 2022 6:47 PM
To: ART HILL
Cc: Ashia Carpenter; Kadeisha West
Subject: Meet and Confer -- Hill v Carvana, LLC and Experian Information Solutions, Inc., Case No. 1:21-cv-00714

Follow Up Flag: Follow up
Flag Status: Flagged

Thank you for the response, Mr. Hill. We still think a meet and confer call would be helpful to clear up any remaining potential misunderstandings or issues regarding Carvana's prior answer, discovery requests and responses, but we understand it is your choice whether or not to participate. If you are agreeable to a call, let us know a few dates and times you are available and we will get it scheduled. If you are not agreeable, and decide to move forward with a motion to compel in the absence of a meet and confer conference, we will respond accordingly.

Paul



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From: ART HILL <artbhill@hotmail.com>
Sent: Saturday, April 23, 2022 6:16 AM
To: Paul Collins <Paul.Collins@nelsonmullins.com>
Cc: Ashia Carpenter <ashia.carpenter@nelsonmullins.com>; Kadeisha West <kadeisha.west@nelsonmullins.com>
Subject: RE: Meet and Confer -- Hill v Carvana, LLC and Experian Information Solutions, Inc., Case No. 1:21-cv-00714

Mr. Collins, after review of the meet and confer responses, I see no reason to not move to compel.

Additionally, regarding any amendment to the answer, the deadlines to amend pleadings have past for all parties. I'm not agreeing with any request by Carvana to amend its answer so they better align with the frivolous discovery requests you signed. Carvana knew their answers were not credible (affirmative or otherwise)....and you knew or should have known the answers were not credible before Carvana's discovery requests were signed and sent to me. Furthermore, I specifically brought that up in January per attached, well before the deadlines past.

Thanks,

Art

From: Paul Collins <Paul.Collins@nelsonmullins.com>
Sent: Monday, April 4, 2022 3:39 PM
To: ART HILL <artbhill@hotmail.com>
Cc: Ashia Carpenter <ashia.carpenter@nelsonmullins.com>; Kadeisha West <kadeisha.west@nelsonmullins.com>
Subject: Meet and Confer -- Hill v Carvana, LLC and Experian Information Solutions, Inc., Case No. 1:21-cv-00714

Mr. Hill, attached is Carvana's Response to your March 28, 2022 Meet and Confer Letter. Also attached is a proposed confidentiality order for this case for your review. If the confidentiality order is ok with you, we will file a joint motion requesting the Court to enter the order. Please let us know if you would like to schedule a call to discuss the proposed order or the Response.

Thank you,

Paul



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From: ART HILL <artbhill@hotmail.com>
Sent: Monday, March 28, 2022 2:16 AM
To: Paul Collins <Paul.Collins@nelsonmullins.com>
Cc: Ashia Carpenter <ashia.carpenter@nelsonmullins.com>; Kadeisha West <kadeisha.west@nelsonmullins.com>
Subject: RE: Meet and Confer -- Hill v Carvana, LLC and Experian Information Solutions, Inc., Case No. 1:21-cv-00714
Importance: High

Attached are my issues with discovery from Carvana. Given the answer to RFP 1 alone and the lack of any supplements, I'm confident a motion to compel will be necessary....so I'll wait 7 days to file it...that's an additional 7 days on top of the pointless extension I had agreed to. Not really giving you attorneys more time to withhold, delay and obstruct.

Thanks,

Art

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